

## U.S. Department of Justice

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## **BY ECF**

Hon. Zahid N. Quraishi United States District Judge United States District Court 402 E. State Street Trenton, New Jersey 08608

Re: United States v. State of New Jersey, et al. (21-cv-15031)

Dear Judge Quraishi:

The parties jointly request that the Court schedule the first semi-annual status conference. (ECF No. 12, Settlement Agreement and Consent Decree, ¶ 132). At the conference, the parties will update the Court on the New Jersey Department of Corrections' compliance with the Settlement Agreement and Consent Decree. (*Id.*). Because the independent monitor will be in the District of New Jersey on May 23-25, 2022, we respectfully request that the Court hold the semi-annual status conference on one of those dates. Counsel for Defendants has reviewed and consents to this submission to the Court.

Respectfully Submitted,

/s/ Kerry Dean
Kerry Dean
Deputy Chief
Special Litigation Section
Civil Rights Division

/s/ Michael E. Campion
Michael E. Campion
Assistant U.S. Attorney
Chief, Civil Rights Division
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Enclosure

cc: Matthew Boxer, Esq.

Rachel Moseson Dikovics, Esq.